

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LASHUNDRA JACKSON,)	
)	
Plaintiff,)	
v.)	
)	
STATE OF ALABAMA DEPARTMENT OF TRANSPORTATION, JOE MCINNES, etc.,)	CASE NO. 2:07-cv-645-MEF
)	
Defendant.)	
)	

JOINT MOTION TO MODIFY SCHEDULING ORDER

COME NOW Defendants, the State of Alabama Department of Transportation and Joe McInnes, and Plaintiff LaShundra Jackson, by and through their respective counsel, and move this Court to modify the Uniform Scheduling Order (Doc. No. 13) issued by the Court as follows:

1. To extend the time for filing dispositive motions from May 30, 2008, to and including June 30, 2008.
2. This extension of time will permit the taking of certain depositions which, due to scheduling conflicts, will not be taken until mid-June.
3. The parties' requested modification to the Scheduling Order will not disturb any of the other deadlines in this case. Discovery is set to close on August 14, 2008. Thus, with the parties' requested modification, there will still be one and one-half months left in the discovery period after the dispositive motion deadline.

Wherefore, premises considered, the parties move this Court to modify the Uniform Scheduling Order entered in this case to extend the date of filing dispositive motions to and including June 30, 2008.

RESPECTFULLY SUBMITTED
TROY KING
ATTORNEY GENERAL

s/ Andrew W. Redd
Jim R. Ippolito, Jr. (IPP001)
Assistant Attorney General
Chief Counsel

Andrew W. Redd (RED001)
Jason A. Trippe (TRI012)
Assistant Attorneys General
Assistant Counsel
COUNSEL FOR DEFENDANTS

ADDRESS OF COUNSEL:

State of Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36110
Telephone: (334) 242-6350
Facsimile: (334) 264-4359
reda@dot.state.al.us
trippej@dot.state.al.us

s/Kell A. Simon
Kell A. Simon (SIM061)
COUNSEL FOR PLAINTIFF

OF COUNSEL:

ROSS MELTON P.C.
1104 San Antonio Street
Austin, Texas 78701
Telephone: (512) 474-7677
Facsimile: (512) 474-5306
ksimon@rosslaw.com